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conditions, but without pretrial supervision. She has been compliant with all release conditions and of good behavior since her initial appearance.

When law enforcement initially confronted her, Ms. Burley was cooperative, acknowledging the conduct that police questioned her about. Her initial cooperation with law enforcement continued with prosecutors to reach the Plea Agreement before the Court. The Government provided certain discoverable materials prior to Indictment to facilitate this resolution and, through counsel, Ms. Burley engaged in discussions and meetings with the Government in order to reach a binding Plea Agreement pursuant to Fed. R. Crim. P. 11(c)(1)(C). The Plea Agreement provides that the Government may recommend a sentence of not more than 12 months and one day imprisonment and Ms. Burley may request a sentence of not less than two years of probation, to include six months of home confinement. *See* Plea Agreement, January 13, 2023, at ¶ 6.

II. A Felony-Level Conviction, Two Years of Probation with Six Months Home Confinement, and Restitution Accomplishes the Goals of Sentencing

A. Federal Sentencing Guidelines are Not Presumed Reasonable

Post *Booker*, the United States Sentencing Guidelines (“the Guidelines”) are only the starting point for arriving at the proper sentence. *See Gall v. United States*, 552 U.S. 38, 49 (2007); *United States v. Smith*, 531 F.3d 109, 111 (1st Cir. 2008). After calculating the Guidelines range, the Court should consider factors set forth in 18 U.S.C. § 3553(a) to determine an appropriate sentence, explain its reasoning, and select a sentence that is “sufficient, but not greater than

necessary,” to achieve the goals of sentencing. *United States v. Smith*, 531 F.3d at 111 (quoting 18 U.S.C. § 3553(a)).¹

In selecting the appropriate sentence, “the sentencing court does not enjoy the benefit of a legal presumption that the Guidelines sentence should apply.” *Nelson v. United States*, 555 U.S. 350, 352 (2009) (quoting *Rita v. United States*, 551 U.S. 338, 351 (2007)). “The Guidelines are not only *not mandatory* on sentencing courts; they are also not to be *presumed* reasonable.” *Id.* (emphasis in original).

B. Amy Burley is a first-time offender who has fully accepted responsibility for her conduct

Amy Burley is 47 years old, she and her husband have been together for over 30 years, they married in 1995 and, together, have three daughters, ages 25, 23 and 21. They recently became grandparents. *See* Presentence Report (“PSR”) at ¶ 50. Ms. Burley has lived in Barnstead for nearly her entire life. *See* PSR at ¶ 48. Her parents also live in Barnstead as do her four brothers and their families. *See* PSR at ¶¶ 47 & 48. Two of Ms. Burley’s three daughters continue to live at home, while they both pursue teaching degrees and substitute teach in the local school. *See* PSR at ¶ 50. Her youngest daughter struggles with anxiety, and Ms. Burley is a primary source of stability and comfort to her daughter. *See* PSR at ¶ 50.

¹ Factors To Be Considered in Imposing a Sentence. The court shall impose a sentence sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2) of this subsection. The court, in determining the particular sentence to be imposed, shall consider—

(1) the nature and circumstances of the offense and the history and characteristics of the defendant;

(2) the need for the sentence imposed—

(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;

(B) to afford adequate deterrence to criminal conduct;

(C) to protect the public from further crimes of the defendant; and

(D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner; . . . *See* 18 U.S.C. § 3553(a)(1) and (2).

Ms. Burley's mother is in poor health. She recently underwent a heart transplant, kidney transplant, and hip replacement. Ms. Burley shares caretaking responsibilities for her mother along with her brothers. *See* PSR at ¶ 47.

Ms. Burley has no prior criminal record. *See* PSR at ¶¶ 39, 40 & 41.

The PSR's net worth analysis reflects that Ms. Burley is of modest means. She also confronted significant financial demands during the time period of the events in this case. She presently has a net worth of approximately \$10,000. *See* PSR at ¶ 63. Her husband owns and operates a contracting business, "R Burley Enterprises", does not have a consistent monthly income, and his present average monthly net income is approximately \$2,500. *See* PSR at ¶ 65. The weight of the funds she stole went to pay her daughter's school loans and toward on-line shopping through Amazon, both of which she struggled to manage. *See* PSR at ¶¶ 20 & 23. She was forthcoming about this when she was confronted by law enforcement, explaining that the student loan money was for her daughter's tuition and that she had taken out a Parent Plus loan about which her husband was unaware, which led to tension between them. She sought to repay the loan with stolen funds to quell that concern. *See* PSR at ¶ 23.

Following the revelation of the thefts in this case, Ms. Burley took prompt steps to legally secure funds with the plan to repay any missing money while engaging in personal and therapeutic steps to address concerns for her underlying conduct. Specifically, she and her husband went to the extraordinary length of selling their family home following the discovery of the thefts to raise funds in anticipation of tending to restitution. *See* PSR at ¶ 51. The PSR explained that Ms. Burley has a shopping addiction and relied on shopping as an outlet to manage her stress and anxiety. *See* PSR at ¶ 54. She pursued treatment at Dutile Christian Counseling following discovery of the thefts where she attended regular counseling sessions for approximately one year and continues in

counseling as needed, presently. *See* PSR at ¶ 54. Her counselor extolled her efforts in counseling and reaction to the thefts in this case, stating:

...Amy has proven herself eager to change, wanting of growth, and genuinely remorseful for her actions. She has taken full responsibility for her situation while also gaining significant insight as to why she did what she did. She has implemented new, healthy, daily dealing habits in her life that promise long-term stability and endurance for the inevitable stresses of life...

See Supportive Letters attached hereto as Exhibit A (Shaun Dutile, MA, BCCC).

Ms. Burley respectfully asks that the Court sentence her to two years of probation to include six months of home confinement and restitution of the full loss of \$131,261.78, which she plans to satisfy at the time of sentencing. This sentence would continue to permit her to support family's on-going effort to assist her father during a period of failing health and support her daughters that still live at home as they take their first steps toward their own personal and professional independence, while continuing to address her own underlying issues that led to the thefts in this case as she has done effectively since this matter came to light well over two years ago.

C. Illegal Conduct

Ms. Burley served as a bookkeeper for the Barnstead School District. In that role she printed payroll manifests and had access to employee benefits and payroll information. *See* PSR at ¶ 9. The Treasurer for the school district realized that Ms. Burley's gross pay for the pay period exceeded what it ought to have been based on her annual salary, which led to the discovery of other such payroll irregularities. *See* PSR at ¶ 10. On September 19, 2019, the Superintendent met with Ms. Burley to ask about the payroll irregularities, but was not satisfied with her answers and terminated her. *See* PSR at ¶ 14.

The school district then conducted a forensic audit, relying on outside accounting. That audit revealed that Ms. Burley received a family dental plan, but only had the cost for a two person

plan withheld from her pay, resulting in a higher net pay to Ms. Burley and additional expenses to the school district. *See* PSR at ¶ 18. The corresponding loss was \$19,468.87. *See* PSR at ¶ 18.

A further review of general ledger reports and vender lists uncovered payments to student loan servicing companies on behalf of Ms. Burley's children as well as an Amazon account and an Amazon card that were unknown to her superiors. *See* PSR at ¶¶ 19 & 20. She relied on district funds to make payments for school loans on behalf of her children as well as a significant number of Amazon purchases for personal items, including items for her daughter's wedding. The combined loss was \$90,826.42. *See* PSR at ¶ 20.

Ms. Burley worked for the Hampton School District following her employment at Barnstead, beginning on September 27, 2019. *See* PSR at ¶ 21. When her conduct in Barnstead came to light, Hampton also audited their finances and found five unauthorized payments to either credit card companies or student loan companies. *See* PSR at ¶ 22. The total loss to Hampton School District was \$20,966.52.

Members of the Barnstead Police Department interviewed Ms. Burley on January 26, 2021 and she admitted to the thefts from Barnstead, her purchases from Amazon, and payments to school loan companies on behalf of her daughters. *See* PSR at ¶ 23. While she did not talk about any thefts in Hampton, she was not asked about it either. *See* PSR at ¶ 23.

D. Federal Sentencing Guidelines

Ms. Burley has no objection generally to the calculation of the Guidelines by U.S. Probation, which arrived at a Total Offense Level of 13. *See* PSR at ¶¶ 27 – 37. Her criminal history score is zero, resulting in a criminal history category of I. *See* PSR at ¶¶ 41-42. This places her applicable guideline range in Zone C of the Sentencing Table. *See* PSR at ¶ 74.

If the applicable guideline range is in Zone C of the Sentencing Table, the minimum term may be satisfied by “a sentence of imprisonment that includes a term of supervised release with a condition that substitutes community confinement or home detention . . . provided that at least one-half of the minimum term is satisfied by imprisonment.” Federal Sentencing Guidelines Manual § 5C1.1(d)(2).

E. Ms. Burley’s Proposed Sentence Achieves the Goals of Sentencing

Ms. Burley’s proposed sentence provides sufficient and appropriate punishment, adequate deterrence to Ms. Burley and the public generally, and reflects the seriousness of the offense to promote respect for the law, while also considering the history and characteristics of Ms. Burley. *See* 18 U.S.C. § 3553(a)(1) and (2).

The parties stipulated to a sentencing range pursuant to Fed. R. Crim 11(c)(1)(C) whereby she may request that the Court sentence her to not less than two years of probation to include six months of home confinement. *See* Plea Agreement at ¶ 6.

The PSR noted that the Court may wish to consider her lack of criminal history, mental health, efforts at liquidating assets to satisfy restitution, her lack of substance use issues and the characteristics of the offense, itself, in assessing a sentence outside the guideline range. *See* PSR at ¶ 86. Indeed, these factors weigh in favor of a variance in Ms. Burley’s case. Over two years have passed since law enforcement confronted Ms. Burley with the Barnstead thefts. When they did, she admitted to her conduct. With the support of her family thereafter, she immediately took steps aimed at making the victims whole by selling the home where she raised her three daughters. She distinguished herself from others under her circumstances, by selling her family’s home to gather funds to address the loss in this case. In this way, she not only admitted her conduct, but took steps to start to pay for it and she did so before any court suggested restitution or ordered it

in her case. At the same time, she took steps to address the concerns that led to the conduct in this case. She attended therapy where she further took responsibility for her wrongdoing, gained insight into her actions, and implemented new habits to absorb stress. She has led a life free from crime prior to and since the events in this case. The events in this case reflect financial strain at the time as her family addressed the considerable costs of college and family weddings against the backdrop of a modest income. That is not said to forgive the crime Ms. Burley committed. Rather, these realities place her conduct in the context in which it occurred.

Ms. Burley's admission to her conduct as well as prompt efforts to gather funds to pay back the loss to the victims reflect her positive personal traits that warrant a variance in this matter. The pile of supportive letters written by her friends, family and community leaders and submitted to the Court speaks to her character in spades.

Her daughter Britany wrote: "my entire life she has always put me and my sisters first and always made sure we knew how special we were and how much we were loved." *See* Supportive Letters attached hereto as Exhibit A (Britney Burley). Her daughter Brianna described her as the best mother in the world, while her daughter Brooke described her as her "best friend and the best grandmother possible." *See* Supportive Letters attached hereto as Exhibit A (Brianna Burley & Brooke Morse).

Her pastor also wrote on her behalf, pointing out she had taken responsibility for her wrong and stating: "Because I see such a heart in her, that recognizes her fault, as well as recognizing the many ways that it hurt others, it seems only logical that grace would naturally apply in her case." *See* Supportive Letters attached hereto as Exhibit A (Jeremy Smiley).

The Pittsfield Police Chief described the supportive role Ms. Burley plays in her family, stating: "I am asking Your Honor to consider not incarcerating Amy as she is still a vital part of

her daughters lives and is also a frequent caretaker to her grandson.” *See* Supportive Letters attached hereto as Exhibit A (Joseph M Collins, Chief of Police).

Supportive letters submitted to the Court in such cases are typically positive, but these are just a sample of letters that friends, neighbors and community leaders submitted on her behalf. To a person, they describe her depth of character and, from a survey of these letters, similar themes surface, describing Ms. Burley as someone that has taken both responsibility for her actions and steps toward making victims whole, while being a source of love and support to her family.

A felony-level conviction, six months of home confinement, two years of probation and restitution for a first-time, non-violent offender is sufficient punishment. The sentence sends a clear and strong message that if anyone, even a first-time offender, commits a theft of this type, she will be prosecuted and be a convicted felon for the rest of her life. A term of incarceration in a Federal Bureau of Prison is not necessary to achieve the goals of sentencing in this case. Ms. Burley is not a threat to the public and is not a risk to reoffend.

III. Sentencing Request

Ms. Burley respectfully requests that the Court grant a variance and impose a below-guideline sentence of two years of probation with the condition of six months on home confinement, and full restitution. This sentence would be sufficient, but not greater than necessary, to achieve the goals of sentencing pursuant to 18 U.S.C. § 3553(a).

Respectfully submitted,

Amy Burley
By Her Attorneys:
SHAHEEN & GORDON, P.A.

Dated: May 22, 2023

/s/ James D. Rosenberg
James D. Rosenberg
NH Bar #14790
P.O. Box 2703

Concord, NH 03302-2703
(603) 225-7262
jrosenberg@shaheengordon.com

EXHIBIT A



4/18/23

Dutile Christian Counseling
137 White Oaks Rd
Laconia, NH 03246

To Whom It May Concern,

Amy Burley (47) has been meeting with me weekly since February 2nd, 2021. In our eleven sessions together, Amy has proven herself eager to change, wanting of growth, and genuinely remorseful for her actions. She has taken full responsibility for her situation while also gaining significant insight as to why she did what she did. She has implemented new, healthy, daily dealing-habits in her life that promise long-term stability and endurance for the inevitable stresses of life. She has made personal reparations and amends with persons affected by her decisions, resulting in new growth and happiness in those relationships.

In conclusion, I am very pleased with Amy's progress and confident of her future as a positive contributor to society.

Sincerely,

Shaun Dutile
M.A. Professional Counseling
Member American Association of Christian Counselors (AACC)
Board Certified Christian Counselor (#0601, BCCC)
Tax ID#:001740438
NPI: 1508568650



4/8/21

Dutile Christian Counseling
137 White Oaks Rd
Laconia, NH 03246

To Whom It May Concern,

Amy Burley (45) has been meeting with me weekly since February 2nd, 2021. In our seven sessions together, Amy has proven herself eager to change, wanting of growth, and genuinely remorseful for her actions. She has taken full responsibility for her situation while also gaining significant insight as to why she did what she did. She has also implemented new, healthy, daily dealing-habits in her life that promise long-term stability and endurance for the inevitable stresses of life. In conclusion, I am very pleased with Amy's progress and confident of her future as a positive contributor to society.

Sincerely,

Shaun Dutile

M.A. Professional Counseling
Member American Association of Christian Counselors (AACC)
Board Certified Christian Counselor (#0601, BCCC)
Tax ID#:001740438

April 11, 2023

Your Honor,

I am writing this letter in support of Amy Burley. I grew up several miles from Amy and her family and have known them quite well over the years. I have never known Amy or any of her four brothers or parents to be involved in any negative behavior. After high school Amy married my wife's brother so I have stayed in regular contact with her over the last 35+ years. Amy has always been a good wife to her husband and a dedicated and loving mother to her three daughters and now to her grandson. She has also been a caretaker for numerous children over the years and is a hard worker who always puts her family first. I have served as a law enforcement officer for over 30 years and am currently the Chief of Police in Pittsfield NH. I recognize the severity of the crime that Amy has admitted to being involved in and I respect the law as much as anyone. I know Amy is remorseful and she and her husband sold their house and are now renting so they could pay back the funds. I am asking Your Honor to consider not incarcerating Amy as she is still a vital part of her daughters lives and is also a frequent caretaker to her grandson. She also makes meals for the family and they rely on her on a daily basis. I have struggled with this over the last two years but I cannot see the benefit of incarcerating Amy. I know you have a tough job that it is not easy and I will respect whatever decision you make. Thank you for your time.

Sincerely,

Joseph M Collins
Chief of Police
Pittsfield NH

U.S. District Court
District of New Hampshire
55 Pleasant St #110
Concord, NH 03301

Your Honor,

I wanted to take a few minutes and speak about Amy Burley and her family. I have known Amy, and her husband Rick, for over 20 years. Amy and Rick raised their family in the Barnstead / Pittsfield area and became very active in the community raising their girls. I have known them to be a very hard-working family who is always willing to help anyone.

When I speak of Amy it is difficult to only speak about her. This is because of the closeness of this family. Amy and Rick have created a loving family, having devoted so much time to raising and guiding their children on the right paths. Amy and Rick are now Grandparents and continue to provide love and support to their children and now grandchildren.

When I heard of the charges against Amy I can tell you that I was truly shocked. I know that her actions have caused hurt to many people who expected more from her. I can tell you that she has taken responsibility for what she has done. I know Amy is deeply sorry for the pain and disappointment she caused both the community and her family. This incident is something that will live with her and her family for many years. It hurts the most when the person who fails us is the ones we trust, love, admire, or look up to. These are the things that both the community and family expected in Amy. Amy knows this and these are the disappointments she will live with as she works to rebuild these damaged relationships.

I have been involved in the law enforcement field for over 20 years and have a great deal of respect for the law and the court system. I know and trust that the court system is fair and just to all who go before it. This letter tells only a small portion of who Amy is and I know she and her family will stand together and support one another. I also know that Amy will be a better person because of this.

Sincerely,



Barrett J. Moulton
16 Bean Hill RD
Belmont NH 03220
603-491-0603



4/18/23

Dutile Christian Counseling
137 White Oaks Rd
Laconia, NH 03246

To Whom It May Concern,

Amy Burley (47) has been meeting with me weekly since February 2nd, 2021. In our eleven sessions together, Amy has proven herself eager to change, wanting of growth, and genuinely remorseful for her actions. She has taken full responsibility for her situation while also gaining significant insight as to why she did what she did. She has implemented new, healthy, daily dealing-habits in her life that promise long-term stability and endurance for the inevitable stresses of life. She has made personal reparations and amends with persons affected by her decisions, resulting in new growth and happiness in those relationships.

In conclusion, I am very pleased with Amy's progress and confident of her future as a positive contributor to society.

Sincerely,

Shaun Dutile
M.A. Professional Counseling
Member American Association of Christian Counselors (AACC)
Board Certified Christian Counselor (#0601, BCCC)
Tax ID#:001740438
NPI: 1508568650



Great Bay Calvary

March 23rd, 2023

To whom it may concern,

I have known Amy Burley for around a year. During this time, we have had numerous conversations. I have been privileged to know her and her family. Amy is a joy to be around and adds a lot to our church family. I can say without a doubt that Amy is a caring mother and grandmother. She is a loving wife and is aiming to allow God to change her life day by day. She is genuine in her love for God and for others.

Amy has been very open and honest with me about her past and how much she wishes she would not have done the things she has done. Her immediate ownership of her mistake was refreshing and unfortunately rare nowadays. There is a real sense of brokenness over it. I have walked through too many court cases as a pastor with folks. I can say that many are sad they got caught. I have never got that sense with Amy. She is relieved that this has been drug out into the light so that it can be dealt with. I believe that God extends grace to all of humanity through the death and resurrection of Jesus. But there is a need for each person to repent and own their mistakes. There is no doubt in my mind that Amy has done just that. Furthermore, there is a peace that I see in her that can only come from a heart that is repentant.

Because I see such a heart in her, that recognizes her fault, as well as recognizing the many ways that it hurt others, it seems only logical that grace would naturally be applied to her case. I am writing to plead for leniency and mercy for Amy, as well as her entire family. Who are already bearing the load of her indiscretion.

She was wrong but is also not making excuses and passing blame. I am praying that God will grant you wisdom as you weigh justice and mercy together in Amy's case. Thank you for considering this letter in your decision.

Respectfully,

Jeremy Smiley
Lead Pastor
Great Bay Calvary Church

Great Bay Calvary Church

Physical Address: 23 Cataract Avenue, Dover, NH 03820

Mailing Address: 57 Betts Road, Rochester, NH 03867

Grace Smiley
57 Betts Rd.
Rochester, NH 03867
25 Mar 2023

To Whom it may concern,

I have known Amy Burley for a little over a year, ever since she and her family started coming to church with me. From what I know of Amy, she is a loving wife, mother, grandmother, and friend. She is quiet and kind-hearted. Her family is of the utmost importance to her.

Shortly after we met, Amy shared her story with me, of what she's been through, including choices she made that brought her to where she is today. She did so with humility, a heart of repentance and a desire to move past the mistakes she made. In recognition of her own weakness and vulnerability, she a strong will to put all these things behind her and begin the next chapter of her life, so that she and her family can start to rebuild.

Through the grace of God, this restoration has already begun. She and her family attend church consistently, with the goal of pressing into a relationship with God and a desire to see Him continue to change her more into Christ's image. Aside from church, I have observed that, she is pouring her life into spending time with her family and taking care of those she loves.

I believe that Amy has learned from her past mistakes and made positive changes to her life as a result. I am confident that she would not repeat the same choices that led her to where she is today.

Sincerely,

Grace Smiley

Your Honor,

My name is Kristina Fournier and I live in New Durham, NH. I leave my two children ages 3 and 7 months with Amy Burley who has been babysitting my children for almost a year now. I would not trust my children with just anyone, especially where as I work in Law Enforcement and have been for 10 years. Saying that I trust Amy with my children is saying a lot coming from someone like me. If I for the slightest chance did not trust her with my kids, they would not be there.

Amy is like a second Mother to my kids and they adore her. She keeps me updated and informed on the littlest thing that a normal daycare center would not. For example, how many bottles my son has had or how often he uses the bathroom to a picture or craft my daughter made. Amy treats my children as if they were her own and is very calm and patient with them. Amy was born to be a Mother, Grand Mother and to be around children in general. In my time knowing Amy she has been respectful, kind, and genuine.

Respectfully,
Kristina Fournier

Tiffany Sanborn
232 North Road, Center Barnstead, New Hampshire, 03225
(603) 268-1135
trs4578@gmail.com

Date: March 1 2023

To Whom This May Concern,

My name is Tiffany Sanborn and proud to offer my recommendation of Amy Burley to whom I have personally known for 2 years as my friend.

I met Amy Burley in 2021 through her daughter, Brooke Morse. Brooke and I would often talk at work about her family and how close she was with her mother. When I finally got to meet Amy, I quickly saw why Brooke talked so highly of her.

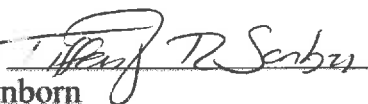
In January 2021 I had my first baby and for the longest time after I was a nervous wreck leaving her with anyone. I bounced around to so many centers and sitters that ended up not being a good fit for our family. When I met Amy, she had offered to watch my daughter for me. My stress had been lifted at that point, I had no worries that my daughter would be taken care of properly. Little did I know the relationship that would blossom since then.

Amy has always gone out of her way to show how much she loves not only her family but her friends as well. She has been beyond generous and kind to both my daughter and my family. We have come to view her as family.

It is clear to see that Amy has a big heart and is a great mom, friend and practically Grammy to my daughter. My family and I have gained a lot when we became friends with Amy. She truly is a remarkable person to have in our lives.

Please do not hesitate to contact me if you should require any further information.

Sincerely,

Signature  Date: 3-1-23
Tiffany Sanborn

From: fabrizio cusson cusson9450@yahoo.com
Subject: Character Letter
Date: Apr 1, 2023 at 6:26:23 PM
To: burley11@yahoo.com

To Whom It May Concern,

I am writing this letter on behalf of Amy Burley. I have known her for many years.

Our children grew up together in the small town of Barnstead, NH. She and her husband were always involved in the local community, whether with sports or other activities. Amy has always been a loving, kind and supportive mother and a friend to many. Her family is very close and a huge support to each other. Amy has been a part of Barnstead for many years. I am hoping she can stay with her family and watch her grandchildren grow up in the town where she raised her children.

Sincerely,

Jennifer Cusson

Priscilla Tiede
193 Wes Locke Road
Barnstead, NH 03218

2/24/23

Dear Your Honor,

I have known Amy Burley since she was a young child growing up in our town. I watched her grow into a wonderful wife and mother. I worked at the elementary school in town and often interacted with Amy and her girls. It was always a joy to watch Amy and her family at sporting events. Amy comes from an amazingly close knit family and married into one just as wonderful. I believe Amy to be a good person and believe she is truly remorseful. It is my hope that she is able to continue to stay at her home with the family she loves and who love her.

Sincerely,

From: Sarah Wentworth swentworth81@yahoo.com
Subject: Sarah wentworth
Date: Mar 23, 2023 at 1:29:47 PM
To: burley11@yahoo.com

Dear Judge

I have known Amy Burley all 41 years of my life. She wasn't only brought up as my cousin but more of an older sister role model.

Amy has always been there for her family and mine. She was always there for myself and my siblings during the hardest time in our life losing my mom. She made sure we all knew she was there in a moments time when we needed her.

Amy is an amazing, beautiful, thoughtful and caring person that everyone would be lucky to know. We all make mistakes in life and if anyone deserves a second chance that is Amy. Thank you for taking the time to read this.

Sincerely
Sarah Wentworth
191 hamwoods road
Alton NH 03809

Sent from my iPhone

From: Renae Clement RClement@atlantictape.com
Subject: Amy
Date: Mar 21, 2023 at 10:28:07 AM
To: burley11@yahoo.com

Dear your Honor,

I met Amy 41 years ago when I just started dating her uncle. She was a fiesty little thing with so much love for her family.

We became instant friends. Or should I say she was my little tag along. We spent so much time together, whether it was her sleeping over or taking my boys to the beach.

I think my husband and I might have brought her to her first concert. Over the years we have made so many memories together. Amy is one of the most loving mothers I may have ever met.

The love she has for her family is something alot of people only wish they had. When her daughter Brooke went through the nightmare of giving birth to Jax, knowing he wasn't coming home, Amy was by her side

every step of the way. Through the grief and loss to the excitement over the little boy, who they were able to bring home. Amy and Rick have built a life together and everything they they do is as a family. Together they have raised three beautiful daughters, and now have a one year old grandson. Amy also has two elderly parents that both have serious medical problems.

Amy has been a constant in the journry for both her father and mother's medical decisions. That journey is far from over. I can't even imagine the impact it would have on her family if she wasn't there.

Thank you,

Ren'ae Clement

From: k wood woodkl1@yahoo.com
Subject: Amy
Date: Mar 7, 2023 at 4:49:40 PM
To: burley11@yahoo.com

To Whom it may concern,

I am writing you on behalf of Amy Burley. I have known Amy my entire life. Amy is one of those people who truly believes that family is everything, she will drop everything that she is doing to help someone in need. When Amy was going through what was probably the most difficult time of her life she would still make time to check in on me to make sure I was doing ok.

Amy has dedicated her entire life to helping her mother and father and when she became a mother herself she became the mother that I aspire to be.

Amy is an amazing human being who happened to do a wrong thing and who is now trying extremely hard to right that wrong.

I firmly believe that Amy is worthy of Grace.

Sincerely,
Katie Wood
[\(603\)491-9570](tel:(603)491-9570)
16 Valley Rd
Alton, NH 03809

[Sent from Yahoo Mail for iPhone](#)

Patrick J. Bousquet

456 North Barnstead Road
Barnstead N.H. 03225
603-848-8350

February 10, 2023

Amy Beth Burley

John Tasker Road
Barnstead NH 03225

To Whom It May Concern,

Hello, my name is Patrick, I am Amy's brother. I am writing this character letter for my little sister in hopes that I can bring to the court a fuller picture of the whole person Amy is.

To say Amy is kind and caring isn't just words it's action and how she is there for her family. As an example, our mom has had multiple health issues finally resulting in a heart transplant, then dialysis that resulted in a kidney transplant. My sister and I have been with my parents EVERY step of the way. She along with myself and my dad would spend countless hours, days and weeks being there for our mom. Sometimes together, like sharing a hotel room to shower and sleep in between 18 hour days being by our mom's side waiting for her to wake up from the transplants. Other times taking turns as we balanced work and family while always making sure mom was never alone as we promised. In short Amy is a full family member, that is always there for her family as we are for her.

I want to thank the court for the opportunity to share just one of countless ways Amy is a vital family member to us ALL. Amy is very loved as you will hear about in other letters from the rest of our family and friends. As her brother I would just like the court to know Amy is truly a wonderful person with much to offer especially as a mom and a new grandma!

Amy has taken great strides with therapy and church and I respectfully ask the court for leniency toward my little sister. She is so much more than the mistake she made.

Sincerely,

A handwritten signature in black ink that reads "Patrick J. Bousquet". The signature is fluid and cursive, with the first name "Patrick" and last name "Bousquet" clearly legible.

Patrick J. Bousquet

Paul & Anita Bousquet

19 Gray Road
Barnstead NH 03218
603-269-7711

February 15, 2023

Amy Beth Burley

John Tasker Road
Barnstead NH 03225

To whom it may concern,

Hello, my name is Anita, Amy's mom. Her dad Paul and I are writing you to please see Amy as the wonderful person and daughter she is.

Amy has been a complete joy to us and the family since the day she was born. Amy was the last of our five children and being the only girl after four sons, you can see she was special from the start. Amy was a blessing to raise. We recall her birth, her first day of school, first boyfriend, graduation, marriage and having three beautiful daughters of her own. Today she is now the best grandma little Colton could ever ask for.

Amy is beloved by all. Amy is caring as she was there for all my health issue's from heart failure, a heart transplant, dialysis, a kidney transplant and most recently my broken hip. Amy is also there for her father through support and his back issue's, a true daddies girl, we couldn't have gone through this without her. Amy is an incredible mom. The way she raised her children, the way she would be at EVERY event for all three girls was amazing. Making sure all felt as important as the other is a true talent even to this day as they are all adults. To see Amy as a daughter turn into this wonderful mom and now grandma makes us, her parents nothing but proud.

We would like to thank the court for the time to share, we would like to ask the court for leniency for Amy. She has suffered these past two years. She tries to pretend things are ok. However, we see how this mistake has taken its toll on her. Amy has lost her home, (which allows her and her husband to fully repay the debt). She has been pulling away as away of creating her own cocoon. Sometimes Amy is there physically but you can tell her mind is else where.

Please give us our true full Amy back. Please see Amy as we see her, an incredible person, a caring person, a person her family needs and a person that is loved and appreciated.

Sincerely yours,

A handwritten signature in black ink that reads "Paul, Anita Bousquet". The signature is written in a cursive, flowing style.

Paul & Anita Bousquet

Radi J. Roberge

215 Peacham Rd

Center Barnstead, NH 03225

February 23, 2023

To The Honorable Judge,

My name is Radi Roberge, and I am a Program Specialist II with the State of NH; as well as Amy Burley's Aunt. I have known Amy Burley since she was born to My brother Paul and Best Friend /Sister-In-Law Anita. Amy has always been a loving and caring individual to everyone she comes in contact with, but mostly to her family whom she loves and adores.

Amy is married with a husband and Three beautiful daughters; a Son-in-Law and Grandson. Amy is striving to be the best Wife, Mother, Grandmother, Sister, person that she can possibly be.

Amy is working on herself Spiritually; finding the Lord and Mentally, working on finding herself through Counseling. Amy is an Amazing Loving Person and is hoping to be able to at some point put the past behind her and get on with her life with her family.

That is why I am writing this letter to defend Amy Burley because she has always been a respected person, and a genuine person to everyone she has come across.

It is unfortunate that she is in this situation. However, it is obvious to me that Amy Burley will do all that she can to resolve this situation without further problems, and is sorry for any damage or inconvenience she has caused.

I hope that this letter can go some way in convincing the court that Amy Burley is a good person, and this testimony will be taken into consideration.

Yours truly,

A handwritten signature in cursive script that reads "Radi J. Roberge". The signature is written in dark ink and is positioned above the printed name.

Radi J. Roberge

February 28, 2023

RE: Amy Burley

To Whom it May Concern,

This letter is being written regarding Amy Burley's character.

I have known Amy for 31 years (she is my sister-in-law). She has always been a person I can count on when I need someone to talk to. She listens without judgement and provides a calm voice when needed.

She has been an amazing aunt to my two sons. She has never turned them away when they have reached out to her (even when it is late at night). In fact, she has talked late into the night with my son when he was going through a very difficult time in his life. For this I will be forever grateful.

Amy is a very loving, kind, and compassionate person. She has always put her family first. She has spent hours upon hours traveling to/from Boston to help care for her mother after both her heart and kidney transplants. She also made sure that her father was well taken care of during these times. Reaching out and arranging to have meals made for him and that he had help with day-to-day stuff.

Amy's love for her family shines through in everything she does. To see how she lights up when she has her grandson is amazing.

Sincerely,



Tammy J. Bousquet

February 28, 2023

Your Honor,

My name is Staci Bousquet and I'm writing on behalf of Amy Burley who I have known for over 30 years. We met in high school where Amy was quiet and well liked. I later married Amy's brother, Jeff, and our families have been close ever since. Our two boys and Amy's three girls are close in age and attended the same schools. Our children all played sports and our husband's coached several school teams. Amy would help the teams with anything she could including organizing team dinners, coordinating tournaments, planning events, giving rides etc. She was trusted and well liked by other parents.

I was shocked to learn of Amy's embezzlement charges as I have always known her to be a responsible person of good character. Amy has great remorse over her actions and I'm confident that she will not make such poor decisions in the future. Not only because it is morally and legally wrong, but because she realizes how much pain and embarrassment it has caused her family. Her family needs her now more than ever and I would respectfully ask for your consideration in sentencing her to home confinement.

Sincerely,

Staci Bousquet
156 Georgetown Drive
Center Barnstead, NH 03225
603-365-0258

Jackie Therrien
PO Box 263
Barnstead NH 03218
603-470-9644

March 24, 2023

It is without hesitation that I write a Character letter for Amy Burley. I have known Amy for the last 15 plus years. I have watched her raise her children, be an amazing wife and loving daughter. I now get to watch her adore her grandson.

Through the years, I have known her to be a tentative, caring mom, whose family is everything.

Her kind demeanor and caring personality has spilled over into her children's personality. Amy is soft spoken and very respectful of those around her.

Please feel free to contact me with any questions.

Respectfully,

Jackie Therrien

Your honor,

I am writing this letter in favor of my mom Amy Burley. My mom is genuinely the kindest, most giving person I have ever met. My entire life she always put me and my sisters first and always made sure that we knew how special we were and how much we were loved. Growing up there was not a single field trip, school concert, or sporting event that she missed. She was the mom who always volunteered at school or sports. She even coached my kindergarten soccer team even though she knew nothing about soccer, but otherwise we wouldn't be able to have a team so she did it so I wouldn't have to miss out. My mom is truly my rock. I have struggled with crippling anxiety from a very young age and my mom has been by my side through it all. From taking me to countless therapists and psychologists as a kid, to years of research, to genuinely trying everything possible to help me with my anxiety. She even cared enough to allow me to switch to virtual school in middle school when my anxiety became physically crippling. She still to this day even though I am 21 years old, spends many nights sitting in my bed with me holding a cold compress on my head and holding my hand until my panic attack passes. Because of my anxiety I do not have a driver's license, my mom without hesitation has been the most selfless person and offers to drive me wherever I need or want to go to make sure I don't miss out on things despite my struggles. My mom is truly the only person or thing that can help me out of a panic or anxiety attack more than therapy, more than medication, my mom is what I need when I have anxiety. Family is my mom's heart and soul. My mom is truly the rock of our family and the relationship she and my dad have is a love that I strive to have one day. My mom and I have always been very close and our family has always been very close. However over the past year we have found God and attend church together weekly now as a family. This has truly brought our family even closer. My mom has found comfort in God and I have seen a

huge positive change in my mom through finding god and also through her counseling as well.

My mom is truly my best friend and I would be lost in this world without her by my side.

Thank you for taking the time to read my letter,

Britney Burley

Your Honor,

I am writing this letter in favor of my mom, Amy Burley. My favorite person in this world. You know how most people say, "I have the best mom in the world"? Well, I actually think that I do. Everything that my mom has ever done has been for my sisters and I. If there is one thing about my mom it's that she is always there and she always has been.

I remember when I was younger and she would always volunteer in my classroom or chaperone my field trips. I also remember her being at every single event that I ever had. I played a lot of sports and on a lot of different teams and she was at every single game no matter what. Even in college when we played all over New England and beyond. She has always been and still is my biggest fan. She wasn't just there for me though, she was there for everyone. I can remember my mom getting to my games early when I was younger so she could braid everyone's hair so that me and my teammates could all match. It made everyone so happy. She also made sure that I never had to miss out. For example, in high school I had a state competition for my HOSA (Health Occupations Students of America) program and I was also chosen to represent my high school at the NHIAA (New Hampshire Interscholastic Athletic Association) leadership conference. It happened to land on the same day. My mom waited at Dartmouth College while I presented at my HOSA State competition and drove me to Concord, NH directly after so I could make my NHIAA leadership conference too. My mom made sure I didn't miss out on either opportunity and instead supported me and ensured I got to participate in both. This is just one tiny example of how my mom shows up for me.

I'm 23 years old and my mom still shows up for me and supports me every single day. I'm currently a second grade teacher at Barnstead Elementary School and a full time student at Liberty University in the masters of counseling program. There's no way I could be doing any of it without my mom. There's no way a lot of different people would be doing the things they're doing in their life without my mom. My mom is the glue of my family. In 2021, my older sister Brooke and her husband suffered the loss of their first baby. It was a devastating time for us all but especially my sister. My mom was her rock and still is. My sister now has a one year old son that is my moms world. As you can imagine though, my sister and her husband have some anxiety when it comes to the health and safety of him because of what happened to their first baby. My mom is the only person that they trust to watch him and help take care of him. My mom also supports my younger sister, Britney who has crippling anxiety. My mom is the only one who can help her through a panic attack. This is what I mean when I say my mom is the glue to my family. She truly holds us all together.

One of the best parts of my mom is that she is a saved Christian. Over the last couple years especially through some of the hardest times in our lives I've seen my mom turn to God and

grow a relationship with Him. It's the best thing that's ever happened to my mom and even though I didn't know it was possible, she's become an even better person than she was before.

The last couple of years have been hard for my mom and my family but through it all we've stood by each other, we've grown closer to God, and we've all taken steps forward in life together. It is my hope that you'll take this letter into consideration and allow my mom and my family to continue taking steps forward and not back. My mom has made mistakes just like we all have. She is still the most amazing mom, person, and best friend that I know.

Thank you for your time while reading this letter.

Sincerely,

A handwritten signature in black ink that reads "Brianna Burley". The script is cursive and fluid, with the first name "Brianna" and last name "Burley" clearly distinguishable.

Brianna Burley

Brooke Morse

194 Tibbetts Road, Alton, NH 03809

(603)717-5430

brookeburley@gmail.com

To Whom It May Concern:

I am writing this letter on behalf of Amy Burley. Amy is my Mother, but more importantly she is my best friend and the best grandmother to my children. My mom and I have always had a very close relationship, she has always been there for me and my two younger sisters. Growing up, I cannot remember a sports game or a school event that she wasn't there for and her commitment to always being there for her children hasn't changed throughout our adulthood. Family comes first to her always.

When I think about how to best describe how much my mom means to my family, I think of a day that our lives changed forever. On May 15th, 2021 my husband and I found out that our first child had no heartbeat and that we would have to deliver our stillborn baby. In the moment that the doctors told us that, I looked at my doctor in a time of covid restrictions and said "I need my mom" while my husband looked at her and said "we both need her mom." My mom came to the hospital and held our hands through it all, we needed her. In a time where nothing in my world felt right, her presence brought me comfort. Soon after we lost our first son Jaxson, we got pregnant again and we had our rainbow baby Colton on March 19th 2022. My mom was there for us not only our entire pregnancy and delivery, working through our anxieties and worries every single day, but through this parenting after loss journey as well. She is always a phone call away, a visit away, our voice of reason and comfort. She truly is such a blessing to my husband and I. She is the absolute best grandmother to both of our babies, in Heaven and on Earth. We recently found out that we are expecting our third baby in October and we cannot imagine bringing this baby into the world without her by our side. She helps us raise our children every single day and we are so grateful for the love that she brings our family. She is the only person that we trust to care for our children and our son lights up when he is in her presence.

I respect that my mother, Amy Burley has pled guilty. I am writing this letter in the hope that it will shed light on the kind of person that she is. I truly believe that she is the most selfless person I know, always putting everyone else before herself. As I build my own family, I can only hope to be half the mother & wife to my husband and children that my mom was and is to our entire family.

Thank you for taking the time to read this letter and for your consideration.

Sincerely,

Brooke Morse



Isaac Morse

194 Tibbetts Rd, Alton N.H. 03809

603-393-1700

ike_morse@yahoo.com

To whom it may concern:

My name is Isaac Morse. I am writing this letter on behalf of my mother in-law, Amy Burley. I have known Amy for over a decade and I have been lucky enough to call her family for most of that time. After years spent getting to know Amy, not only do I love her like a mother, but I've grown to admire her as a role model for my own parenting. She is the back bone of her family and is truly a wonderful example of what it means to be a loving wife and a fiercely devoted mother.

Amy is a woman that requires little praise, though she deserves much. She is an entirely selfless person, that given the opportunity, will always put family first. On every occasion she has risen above and beyond what is asked and instead does what she knows is needed. She has been at every high and low point of my adult life. My first born child was born without a heart beat. And although I am immensely grateful to have held my son in my arms, a silent baby is the most heartbreaking noise a parent can hear. Amy was there, in the delivery room with my wife and I. By our side when we needed her most, she was the person we leaned on. Through her own heartbreak she put our needs first.

While, on the day my second child was born a healthy, screaming little boy, Amy was also there. Due to covid protocols, you are allowed only one extra person in the delivery room. My wife and I did not need to have a conversation about who this extra person would be. Of course it was her. She helped us navigate the emotions and anxiety of delivery. But life isn't filled with moments as high and low as these. Life is mostly the inbetween. It is my observation that Amy handles the inbetween days with equal grace and compassion.

I understand that she has pleaded guilty and while I respect the legal process I do hope that I was able to give you some insight as to the person she really is at her core. A truly good person. I hope that this will be considered. Thank you for your time and consideration

Sincerely,

